United States Bankruptcy Court Southern District of Texas

ENTERED

September 13, 2023 Nathan Ochsner, Clerk

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	
	§	Case No. 20-33948 (MI)
Fieldwood Energy III LLC, et al.,	§	
	§	Chapter 11
Post-Effective Date Debtors ¹ .	§	
	§	Jointly Administered

STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE AND RESETTING HEARING DATE ON PLAN ADMINISTRATOR'S OBJECTION TO PROOFS OF CLAIM FILED BY PEREGRINE OIL & GAS, LP [Relates to Docket No. 2841]

This stipulation and agreement (the "Stipulation") is entered into by and among (i) David Dunn, the plan administrator (the "Plan Administrator") appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016]²; and (ii) Peregrine Oil & Gas, LP ("Peregrine") regarding the Plan Administrator's Objection to Peregrine's Proofs of Claim [Docket No. 2841] (the "Objection"). The Parties hereby stipulate and agree as follows:

WHEREAS, on or about November 25, 2020, Peregrine timely filed separate proofs of claim identified as Claim Numbers 752 and 760 (collectively, the "**Peregrine Proofs of Claim**").

WHEREAS, the Plan Administrator filed his Objection on August 17, 2023, which included

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

a response date of September 15, 2023, and a hearing on October 2, 2023, at 10:30 AM CST.

WHEREAS, the Parties have agreed to enter into and jointly submit this Stipulation extending Peregrine's response date and resetting the date of the hearing in connection with the Objection.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

- 1. Peregrine's deadline to respond to the Objection is extended to and through Wednesday, December 13, 2023, subject to further extensions based on the Parties' agreement.
- 2. The hearing on the Objection is reset to Wednesday, January 24, 2023, at 9:00 AM CST.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

IT IS SO ORDERED

Signed: September 13, 2023

Marvin Isgur United States Bankruptcy Judge

BOND ELLIS EPPICH SCHAFER JONES LLP

/s/ Aaron Guerrero

Ken Green

Texas Bar No. 24036677

Aaron Guerrero

Texas Bar No. 24050698

Bryan Prentice

Texas Bar No. 24099787

950 Echo Lane, Suite 120

Houston, Texas 77024

(713) 335-4990 telephone

(713) 335-4991 facsimile

Ken.green@bondsellis.com

Aaron.guerrero@bondsellis.com

Bryan.prentice@bondsellis.com

ATTORNEYS FOR DAVID DUNN, PLAN ADMINISTRATOR FOR THE POST-EFFECTIVE DATE DEBTORS

-and-

LOOPER GOODWINE P.C.

/s/ Paul J. Goodwine

Paul J. Goodwine (La. Bar No. 23757)

SDTX Federal ID No. 437800

Lindsey M. Johnson (La. Bar No. 34610)

SDTX Federal ID No. 2127344

650 Poydras Street, Suite 2400

New Orleans, Louisiana 70130

Telephone: (504) 503-1500

Facsimile: (504) 503-1501

Email: pgoodwine@loopergoodwine.com Email:ljohnson@loopergoodwine.com

ATTORNEYS FOR PEREGRINE OIL & GAS, LP